

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 22 Civ. 10016 (LAK)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF
PLAINTIFF E. JEAN CARROLL'S OPPOSITION TO
DEFENDANT DONALD J. TRUMP'S MOTION FOR SUMMARY JUDGMENT

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Plaintiff's opposition to Defendant Donald J. Trump's motion for summary judgment.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the official transcript of Trump's October 19, 2022 deposition taken in *Carroll v. Trump*, No. 20 Civ. 7311 (S.D.N.Y.) ("*Carroll I*").

4. Attached hereto as **Exhibit 2** is a true and correct copy of a Truth Social post containing the statement that Trump made about Carroll on October 12, 2022, which was marked as Exhibit 28 during Trump's deposition in *Carroll I*.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Expert Report of Ashlee Humphreys, PhD, dated January 9, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 9, 2023



Roberta A. Kaplan